

Law Offices of Scott E. Kaplan, LLC
5 S. Main Street, P. O. Box 157
Allentown, New Jersey 08501
(609) 259-1112
Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re: CHAPTER 11

Rosa Maria Styles,

Debtor Case No. 19-32881-ABA

**CERTIFICATION OF FELISHA E SANCHEZ IN SUPPORT OF MOTION
TO WITHDRAW AS COUNSEL FOR DEBTOR**

I, Felisha E. Sanchez, of full age, hereby certify as follows:

1. I am the bankruptcy paralegal for Scott E. Kaplan, attorney for the above captioned Debtor. I have worked for Mr. Kaplan for over five (5) years.

2. I have read Mr. Kaplan's certification dated June 30, 2020 which he filed in support of the present motion and I confirm that the information set forth therein is true and correct.

3. Both the Debtor and her spouse, who Debtor has requested we deal with on her behalf, have been difficult to deal with. Both Mr. Kaplan and I have been required to continuously and repeatedly request information from the Debtor and her spouse to enable the timely amendment of Debtor's petition and Debtor's compliance with the Chapter 11 Operating Guidelines issued by the U.S. Trustee's Office to enable the continuation of Debtor's Chapter 11 case.

4. I personally provided the Debtor and her husband with a copy of the Chapter 11 Operating Guidelines upon Mr. Kaplan's formal retention in the case and advised the Debtor and her spouse of the need to familiarize themselves with the information included in the guidelines as Debtor would be required to abide by the requirements and procedures set forth therein. Despite

doing so, the Debtor and her husband seemed to resist providing necessary information, claiming they were not familiar with what was indicated in the guidelines or the necessity for the Debtor to include and disclose all household income in her petition schedules among other matters and they have continuously questioned the justification for and need to abide by these and other requirements.

5. Debtor's spouse, Mr. Schwartz, has told me on a number of occasions that the Debtor and he were appreciative of how I treated them and for what I had done for them. However, despite this office's success in enabling Debtor's case to continue and avoid conversion or dismissal, neither the Debtor nor her husband seemed willing to acknowledge the substantial time or efforts Mr. Kaplan had expended on Debtor's behalf in enabling the case to continue, without interruption, with the Debtor remaining in control of her bankruptcy estate.

6. I certify the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: July 19, 2020

/s/ Felisha E. Sanchez
Felisha E. Sanchez